

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework
and to Examine the Integration of Greenhouse Gas
Emissions Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY
(U 902 M) AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)
ON PHASE ONE ISSUES AND FINAL STAFF RECOMMENDATIONS**

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October 27, 2006

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**I.
INTRODUCTION**

Pursuant to the Rules of Practice and Procedure of the California Public Utilities Commission (the "Commission") and the Assigned Commissioner's Ruling: Phase 1 Amended Scoping Memo and Request for Comments on Final Staff Recommendations (the "ACR"), issued October 5, 2006, San Diego Gas & Electric Company ("SDG&E") and Southern California Gas Company ("SoCalGas") hereby submit these reply comments regarding Phase 1 issues and the final staff recommendations concerning adoption of an interim greenhouse gas ("GHG") emissions performance standard ("EPS") (the "Final Staff Recommendations").

In accordance with direction set forth in the ACR, SDG&E and SoCalGas respond herein only to those arguments that are new or have not been addressed previously by SDG&E and SoCalGas.^{1/} In addition, SDG&E and SoCalGas respond to

^{1/} See, ACR, p 7.

the question posed in the October 23, 2006, e-mail of Administrative Law Judge Gottstein regarding the definition of “new ownership interest.”

SDG&E and SoCalGas submit that in considering the Phase 1 issues discussed herein and in previous filings, the Commission should remain mindful of the fact that the GHG EPS is an interim measure whose primary benefit is in sending a clear signal to load serving entities (“LSEs”) and generation developers and in setting an example for the rest of the nation. In light of this fact, SDG&E/SoCalGas recommend that in crafting the Phase 1 EPS, the Commission should be guided by those parties advocating positions of broad applicability and should refrain from imposing highly stringent interpretations and proposals. In addition, the Commission should adopt an EPS that avoids discouraging new technologies and new renewable energy commitments. SDG&E notes that the Commission will continue to exercise full oversight over the procurement activity and generation ownership of the investor owned utilities (the “IOUs”) through the long-term resource planning process, and can more effectively control the GHG content of IOU procurement through explicit direction in the resource planning process than through an overly-severe GHG EPS. Accordingly, the Commission should adopt the Final Staff Recommendations with the few minor revisions and clarifications proposed by SDG&E and SoCalGas in their opening comments.

II. DISCUSSION

A. The Commission Should Reject the Proposal that Requests for Commission Approval of Tariff Modifications and Submission of IOU Procurement Plans Trigger EPS Review

In their jointly-filed comments, Constellation NewEnergy, Inc., *et al.*, (collectively, the “Joint Commenters”) take issue with the proposal in the Final

Workshop Report to subject IOU generation to the EPS gateway at the time major renovations are proposed.^{2/} The Joint Commenters note that non-IOU generation is subjected to the EPS gateway at the time a contract of five years or more is entered into or renewed, and conclude that the possibility that review of IOU and non-IOU generation may occur with differing frequency establishes that the IOUs will be unduly advantaged under the proposed EPS. These parties declare that the requirement under SB 1368 “that all baseload generation used by the LSE shall be subject to the same standard plainly precludes application of the EPS in a way that favors IOU-owned assets.”^{3/} To remedy this purported inequity, the Joint Commenters propose that requests for Commission approval of tariff modifications and IOU procurement plans be considered “renewed contracts” under SB 1368 for purposes of triggering EPS gateway review.^{4/} The claims of the Joint Commenters and their proposed revision to the Final Workshop Report clearly lack merit and must be rejected.

As an initial matter, SDG&E notes that the potential for differing frequency in the EPS gateway review of IOU and non-IOU generation will not create the disparate treatment under SB 1368 described by the Joint Commenters. The question of the frequency of gateway review has no bearing on the fundamental obligation of all LSEs to meet the EPS, once it is triggered. In that instance, the standard will apply on a consistent basis to all LSEs, regardless of how often gateway review occurs. Thus, the suggestion by the Joint Commenters that adoption of the Final Workshop Report recommendation will result in uneven application of the EPS must be rejected.

^{2/} Comments of Constellation NewEnergy, Inc., *et al.*, pp. 5-8.

^{3/} *Id.* at p. 5 (emphasis in original omitted).

^{4/} *Id.* at pp. 7-8.

With regard to the proposal by the Joint Commenters that requests for Commission approval of tariffs modifications and IOU procurement plans be considered “renewed contracts” under SB 1368 for purposes of triggering EPS gateway review, SDG&E points out that no reasonable interpretation of SB 1368 supports this proposal. The Commission has acknowledged that “[t]he primary objective of statutory interpretation is to ascertain and effectuate legislative intent.”^{5/} In construing a statute to discern the intent of the Legislature, the Commission must first and foremost give effect to the plain meaning of the statute.^{6/} As the Commission has explained:

First, one looks to the plain language of the statute. If the language is unambiguous, then the language controls and the inquiry is over. Otherwise, one proceeds to the legislative history. “The final step -- and one which we believe should only be taken when the first two steps have failed to reveal clear meaning -- is to apply reason, practicality and common sense to the language at hand.”^{7/}

Thus, under the most fundamental rules of statutory interpretation the Commission must first consider the plain meaning of the terminology used in defining an LSE’s long-term commitment as:

[E]ither a new ownership investment in baseload generation or a ***new or renewed contract*** with a term of five or more years, which includes procurement of baseload generation.^{8/}

It appears clear that in using the term “contract,” SB 1368 intended to refer to the standard commercial arrangement for purchase of power that involves the typical contractual elements of offer, mutual assent and consideration. Nowhere does SB 1368 characterize the IOUs’ obligation to file procurement plans or to seek regulatory approval

^{5/} D. 04-04-020, 2004 Cal. PUC LEXIS 137(2004), p. *6 (citing *Halbert’s Lumber, Inc. v. Lucky Stores, Inc.*, 6 Cal.App.4th 1233, 1239 (1992)).

^{6/} See, *Collection Bureau of San Jose v. Rumsey*, 24 Cal.4th 301, 310 (2000).

^{7/} D. 04-04-020, 2004 Cal. PUC LEXIS 137(2004), p. *6 (citing *Halbert’s Lumber, Inc. v. Lucky Stores, Inc.* (1992), 6 Cal.App.4th 1233, 1239).

^{8/} Senate Bill (SB) 1368, Sec. 2, Ch. 3, § 8340(j) (Stats. 2006, Ch. 598) (emphasis added).

for rate changes as a “contractual” obligation, nor do the Joint Commenters cite any legal or regulatory precedent to support their interpretation. The Joint Commenters likewise fail to demonstrate that the legislative history of the statute provides a foundation for their claim. Finally, application of “reason, practicality and common sense” to SB 1368 establishes that the Joint Commenters’ proposal is flawed and must be rejected.

From a practical perspective, implementing the suggestion of the Joint Commenters would accomplish little in terms of establishing similar EPS compliance review cycles for IOU and non-IOU generation. Assuming, *arguendo*, that non-IOU generators would undergo EPS gateway review every five years, the Joint Commenters proposal would require IOU generation to undergo gateway review at least every two years (coincident with procurement plan filings), or approximately twice as often as non-IOU generators.^{9/} The Joint Commenters do not address this significant inconsistency or explain how *this* disparate treatment is distinct from that described in its Opening Comments. Moreover, the Joint Commenters ignore the fact that contracts with non-IOU resources are *not* uniformly of 5-year duration. Many such contracts are for longer terms, such as 10, 15 or 20 years. Thus, forcing IOUs to undergo gateway review on at least a bi-annual basis makes even less sense where many non-IOU generators will undergo EPS gateway review far less frequently than the Joint Commenters suggest. In short, SB 1368 establishes the parameters of EPS review and, based on those parameters, does not appear to contemplate that treatment of IOU and non-IOU generation assets will be *exactly* equivalent in *all* respects. Accordingly, the Commission should reject the Joint Commenters’ recommendation.

^{9/} See, Comments of Constellation NewEnergy, Inc., *et al.*, p. 6.

B. Only Those Generation Plant Changes that Result in a Net Increase in Rated Capacity of a Powerplant should Trigger the GHG EPS.

The Commission has solicited comment on "repowering" and "major renovations" in the context of alterations to existing plant that might trigger application of the EPS, and offered a definition (the "Definition") for parties' consideration:

[S]everal parties refer to "repowering" and "major renovations" in the context of alterations to existing plant that might trigger application of the EPS . . . parties disagree as to whether such alterations should trigger EPS review of utility-retained generation under the "new ownership investment" provision. However, should the Commission rule that they do . . . interested parties [should] discuss in their reply comments whether the following definition would be appropriate for this purpose:

"Any investment that is intended to extend the life of one or more units of an existing baseload powerplant for five years or more, or results in a net increase in rated capacity of that powerplant. "Rated capacity" refers to the nameplate capacity of the plant, i.e., the plant's maximum rated output under specific conditions designated by the manufacturer and usually indicated in a nameplate physically attached to the generator."^{10/}

As SDG&E and SoCalGas have stated previously, the definition of the term "repowering" should be tied to an increase in rated capacity. Accordingly, SDG&E and SoCalGas support the definition of "rated capacity" set forth above. Applying these definitions, SDG&E and SoCalGas agree with the conclusion above that "repowering" is a "new ownership interest" in a modified plant, and that the interim EPS should apply in this instance.

The first sentence of the above Definition -- "Any investment that is intended to extend the life of one or more units of an existing baseload powerplant for five years or more" -- may be problematic, however. First, it is imprecise and could be construed in an overbroad manner. *Any* major repair could be viewed as extending the life of the

^{10/} October 23, 2006, e-mail from Kris L. Keller on behalf of ALJ Meg Gottstein.

generation unit since the plant would be unable to operate without the repair. Or, for example, if a plant could not operate without added air pollution equipment due to changes in local air quality regulations, the expenditure could be characterized as extending the life of the plant.

Second, the provision appears to be inconsistent with SB 1368. In expressly identifying the EPS triggers, the Legislature did not include investments “intended to extend the life of one or more units of an existing baseload powerplant.” Life extension of an existing facility is neither a “new ownership investment,” nor a “new or renewed contract;” it merely maintains the economic viability of an existing ownership interest. SB 1368 by its terms does not apply to existing ownership investments. Thus, under a plain reading of the statute, no basis exists for extending the application of SB 1368 in the manner contemplated in the Definition. It is important to note, however, that eliminating life-extending investments as a GHG EPS application triggering event will not provide such investments with a “free pass.” Regardless of whether the GHG EPS is applicable, such IOU expenditures will remain subject to Commission oversight and will continue to require Commission approval.

C. The Commission Should Reject the CAC/EPUC Recommendation that all Existing Cogeneration be Deemed to be in Compliance with the GHG EPS

The Energy Producers and Users Coalition (“EPUC”) and the Cogeneration Association of California (together, “EPUC/CAC”) point out that “Senate Bill 1368 provided what amount to an exemption for certain existing generation facilities,” namely combined cycle gas turbines (“CCGTs”).^{11/} These parties claim that because CCGTs

^{11/} Comments of EPUC/CAC, p. 8.

are a subset of gas-fired cogeneration, the definition of “combined-cycle natural gas” powerplants appearing in SB 1368 should be interpreted broadly and that the Commission should adopt a “clarification” to the Final Staff Report stating that “[a]ll existing gas-fired cogeneration and bottoming-cycle cogeneration will be deemed in compliance with the EPS provided that the facility meets all PURPA efficiency and operating standards.”^{12/}

As support for this position, EPUC/CAC suggest that this interpretation is required in light of the Public Utilities Regulatory Policies Act of 1978 (“PURPA”) and implementing regulations, which according to EPUC/CAC do not provide “a basis for distinguishing among different types of cogeneration facilities if the facilities meet the operating and efficiency standards established by FERC.”^{13/} EPUC/CAC fail, however, to cite any provision of PURPA or its implementing regulations that prohibits the distinction drawn in SB 1368 between CCGTs and other types of cogeneration. Thus, it does not appear that any conflict requiring harmonization exists. Accordingly, the Commission must consider “the plain language of the statute,” which in this instance is unambiguous.^{14/}

It is clear that SB 1368 does not contemplate that the term “combined-cycle natural gas” powerplants will include *all* types of cogeneration or that this broad category of facilities will be wholly exempted from the EPS. As SDG&E and SoCalGas explain below, SB 1368 does not *exempt* existing CCGTs. Rather, it establishes that the level of emission exhibited of CCGTs is, by definition, acceptable. Thus, SB 1368 refers to CCGTs for purposes of establishing a yardstick by which all other subject entities will be

^{12/} *Id.* at pp. 8-10.

^{13/} *Id.* at pp. 9-10.

^{14/} *See*, D. 04-04-020, *supra*, note 7, p. *6.

measured. If the Legislature intended to grant to *all* cogeneration technologies the same blanket approval that it granted to CCGTs, it clearly would not have included in SB 1368 §§ 8340(k) and 8341 (d)(3), which pertain solely to cogeneration and require the Commission to establish a methodology to measure cogeneration emission characteristics. Moreover, if, as EPUC/CAC suggest, there is no material difference between CCGTs and other types of cogeneration technology, existing cogeneration should be as efficient as CCGTs when accounting for the thermal load and will therefore have no difficulty complying with the interim EPS, thereby rendering this issue moot.

D. The Commission Should Reject the Recommendation that the GHG EPS be Set at 1,000 pounds of CO₂ per MWh

In their jointly-filed opening comments, the Natural Resources Defense Council (“NRDC”), *et al.*, recommend that the Commission adopt a GHG EPS equal to 1,000 lbs. CO₂ per MWh.^{15/} While these parties suggest that most parties support the 1,000 lbs. CO₂ per MWh standard, in fact the opposite is true. Of the many parties that filed post-workshop comments in July, 2006, not one proposed an EPS of less than 1,100 lbs. per MWh for existing gas plants entering into new or renewed commitments. As SDG&E and SoCalGas have pointed out previously, setting the EPS at this level will ensure satisfaction of SB 1368’s mandate that “[a]ll combined-cycle natural gas powerplants that are in operation, or that have an Energy Commission final permit decision to operate as of June 30, 2007, shall be deemed to be in compliance with the greenhouse gas emission performance standard.”^{16/}

These parties also argue, somewhat confusingly, that because SB 1368 deems existing CCGTs to be in compliance, it is not necessary in order to accommodate existing

^{15/} Comments of NRDC, *et al.*, p. 20.

^{16/} SB 1368, *supra*, note 8, § 8341(d)(1).

CCGTs that the standard be higher than 1,000 lbs. CO₂/MWh.^{17/} It is important to note, however, that SB 1368 does not *exempt* existing CCGTs. Rather, it establishes that the level of emission exhibited of CCGTs is, by definition, acceptable. Thus, in establishing the EPS, the Commission must consider at what level the EPS must be set in order to ensure that all CCGTs pass. As SDG&E and SoCalGas have explained, setting the EPS at 1,100 lbs. per MWh will ensure that the full range of CCGTs comply with the EPS. The data presented in this proceeding and demonstrates that there exist CCGTs with emission characteristics that exceed 1,000 lbs. CO₂/MWh.^{18/} Accordingly, the Commission should adopt the 1,100 lbs. CO₂ per MWh standard recommended in the Final Workshop Report.

E. The Claim that SB 1368 Prohibits the Firming of Intermittent Renewables such as Wind Power Must be Rejected

NRDC, *et. al.*, claim in their Opening Comments that SB 1368 “in no way allows any blending of resource emissions.”^{19/} They assert further that “the statutory guidance provided by SB 1368 is clear that the standard is to be applied to the underlying facilities behind a contract, not a blend of their emissions.”^{20/} SDG&E and SoCalGas disagree with this interpretation. SB 1368 does not address contracts for renewable energy that are firming by other generation for transmission purposes.

SB 1368 directly addresses unspecified power (which could be from multiple units or blended), providing that “[i]n developing and implementing the greenhouse gases emission performance standard, the commission shall address long-term purchases of

^{17/} *Id.*

^{18/} *See, e.g.*, Comments of SDG&E and SoCalGas on Workshop Report, filed September 8, 2006, pp. 3-6.

^{19/} Comments of NRDC, *et al.*, p. 23

^{20/} *Id.*

electricity from unspecified sources in a manner consistent with this chapter.”^{21/} Clearly, the Legislature could have placed an outright prohibition on power from unspecified sources, but it did not elect to do so. Likewise, SB 1368 cannot reasonably be interpreted as prohibiting wind power contracts that become baseload generation through firming required for transmission purposes. It would be a highly unfortunate unintended consequence for development of wind generation or other intermittent renewables in the western United States to be delayed due to a flawed interpretation of SB 1368. Accordingly, the Commission must reject the analysis of this aspect of SB 1368 offered by NRDC, *et al.*

III. CONCLUSION

For the reasons set forth herein, the proposals described above should be rejected and the Commission should adopt the Final Staff Recommendations with a few minor revisions and clarifications proposed by SDG&E and SoCalGas in their Opening Comments.

Respectfully submitted this 27th day of October, 2006.

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^{21/} SB 1368, *supra*, note 8, § 8341(d)(7).

CERTIFICATE OF SERVICE

I hereby certify that a copy of **REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON PHASE ONE ISSUES AND FINAL STAFF RECOMMENDATIONS** has been electronically mailed to each party of record on the service list in R.06-04-009. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to the Commissioner Michael R. Peevey and the Assigned Administrative Law Judges Charlotte TerKeurst, Jonathan Lakritz, and Meg Gottstein.

Executed this 27th day of October, 2006 at San Diego, California.

/s/ Jodi Ostrander

Jodi Ostrander

CALIFORNIA PUBLIC UTILITIES COMMISSION

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